The Facebook, Inc. v. Connectu, LLC et al

Doc. 104

ADMINISTRATIVE MOTION FOR FILING UNDER SEAL

1. Papers Submitted For Filing Under Seal in Their Entireties

Pursuant to Civil Local Rules 7-11 and 79-5(b), Defendants respectfully hereby request leave of Court to file under seal in their entireties the following documents being lodged with the Clerk:

 EXHIBITS A, B, AND D TO THE DECLARATION OF SCOTT R. MOSKO IN SUPPORT OF DEFENDANTS' REPLY (FILED UNDER SEAL IN THEIR ENTIRETIES)

Exhibit A includes deposition testimony in a deposition marked "Highly Confidential" or "Confidential" under the protective order.

Exhibit B is a publicly filed document that Plaintiffs marked as confidential. Defendants requested that Plaintiffs allow this document to be publicly filed. Plaintiffs refused.

Exhibit D is supplemental responses to discovery that Plaintiffs have designated highly confidential.

As required by Civil Local Rule 79-5(b), Defendants are lodging with the Clerk copies of the documents which have been designated "Highly Confidential" and "Confidential" (for filing under seal).

SUPPORTING DECLARATION OF SCOTT R. MOSKO

I, Scott R. Mosko, declare as follows:

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- 1. I am an attorney admitted to practice in the State of California and the United States
 District Court for the Northern District of California, and a partner of Finnegan, Henderson, Farabow,
 Garrett & Dunner, L.L.P., attorneys of record for Defendants Pacific Northwest Software and Winston
 Williams. The matters referred to in this declaration are based on my personal knowledge and if
 called as a witness I could, and would, testify competently to those matters.
- 2. The representations made above in this Administrative Motion are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed this 6th day of July, 2007, at Palo Alto, California.

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By:	/s/
	Scott R. Mosko DEFENDANTS' ADMINISTRATIVE MOTION AND IPR

[PROPOSED] ORDER Upon good cause shown, IT IS HEREBY ORDERED that the following documents shall be received and filed under seal in their entireties by the Clerk: Exhibits A, B, and D to the Declaration of Scott R. Mosko in Support of Defendants Pacific Northwest Software, Inc.'s and Winston Williams's Reply to Plaintiffs' Opposition to Defendants' Opposition to Dismiss for Lack of Personal Jurisdiction. Dated: ______, 2007 United States Magistrate Judge